

Appendix 3

[Proposed] Final Judgment

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: FACEBOOK, INC. CONSUMER
PRIVACY USER PROFILE LITIGATION,

CASE NO. 3:18-MD-02843-VC

[PROPOSED] FINAL JUDGMENT

This document relates to:

ALL ACTIONS

On _____, the Court signed and entered its Order Granting Final Approval of Class Action Settlement Pursuant to Federal Rule of Civil Procedure 23(e)(2) and its Order Awarding Attorneys' Fees, Expenses and Service Awards (ECF Nos. ____) (the "Final Approval Order" and the "Order on Motion for Attorneys' Fees and Expenses and Service Awards") in the above-captioned matter as to the following class of persons:

All Facebook users in the United States between May 24, 2007, and December 22, 2022, inclusive.

Excluded from the Settlement Class are (i) Meta and its employees, alleged co-conspirators, officers, directors, legal representatives, heirs, successors, and wholly or partly owned subsidiaries or affiliated companies; (ii) counsel for any plaintiff whose case was consolidated into this MDL and their employees, including but not limited to the undersigned counsel for Plaintiffs and the undersigned counsel's employees; (iii) individuals who submitted timely exclusion requests who are reflected in Exhibit A hereto; (iv) the Discovery Mediators, Special Master, and Settlement Mediator who participated in this case and their staff; and (v) the Judges and Court staff to whom this Action is or was assigned.

JUDGMENT IS HEREBY ENTERED, pursuant to Federal Rule of Civil Procedure 58, as to the specified class of persons; Settlement Class Representatives Steven Akins, Jason Ariciu, Anthony Bell, Bridgett Burk, Terry Fischer, Tyler King, Jordan O'Hara, and Cheryl Senko; Defendant Facebook, Inc. (now known as Meta Platforms, Inc.); and the Non-Prioritized Defendants, Stephen Kevin Bannon and Aleksandr Kogan a/k/a Aleksandr Spectre, on the terms and conditions of the Settlement Agreement approved by the Court's Final Approval Order.

1. For purposes of this Order, the Court adopts the terms and definitions set forth in the Settlement Agreement unless otherwise defined in the Preliminary Approval Order or Final Approval Order.

2. Payments to Settlement Class Members shall be made as outlined in the Plan of Allocation as approved by the Court in the Final Approval Order.

3. Upon the Effective Date: (i) the Settlement Agreement shall be the exclusive remedy for any and all Released Claims of Settlement Class Representatives and Settlement Class Members;

1 and (ii) Settlement Class Representatives and Settlement Class Members stipulate to be and shall be
2 permanently barred from initiating, asserting, or prosecuting against the Released Parties in any federal
3 or state court or tribunal any and all Released Claims.

4 4. Likewise, upon the Effective Date, Defendant and each of the other Released Parties
5 shall be deemed by operation of law to have released, waived, discharged and dismissed each and every
6 claim relating to the institution or prosecution of the Action by Settlement Class Representatives, Class
7 Counsel and the Settlement Class. Notwithstanding the foregoing, the release shall not include any
8 claims relating to the continued enforcement of the Settlement, Pretrial Order No. 10 (Protective Order)
9 or Plaintiffs' motion for sanctions, including but not limited to ECF Nos. 122, 878, 911, 922, 984,
10 1000, 1008, 1061, 1063, 1079, and 1104.

11 5. This Action is settled and dismissed on the merits with prejudice.

12 6. Without affecting the finality of this Judgment, the Court reserves jurisdiction over the
13 Settlement Class Representatives, the Settlement Class, Class Counsel, and Defendant as to all matters
14 concerning administration, consummation, and enforcement of the Settlement Agreement.

15 **IT IS SO ORDERED.**

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18 _____
Hon. Vince Chhabria
United States District Judge

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20 DATED: _____, 2023
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